

Hearing Date: April 20, 2007

Hearing Time: 10:00 a.m. (Prevailing Eastern Time)

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
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DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
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DEBTORS' OMNIBUS REPLY IN SUPPORT OF DEBTORS'
TENTH OMNIBUS OBJECTION (PROCEDURAL) PURSUANT TO
11 U.S.C. §502(b) AND FED. R. BANKR. P. 3007 TO CERTAIN (A)
DUPLICATE AND AMENDED CLAIMS AND (B) EQUITY CLAIMS

Delphi Corporation and certain of its subsidiaries and affiliates, debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"),¹ hereby submit this omnibus reply in support of the Debtors' Tenth Omnibus Objection (Procedural) Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Duplicate And Amended Claims And (B) Equity Claims (the "Tenth Omnibus Claims Objection"), and respectfully represent as follows:

1. The Debtors filed the Tenth Omnibus Claims Objection on March 16, 2007 seeking to disallow and expunge certain "Claims," as that term is defined in 11 U.S.C. § 101(5), because such Claims (a) are duplicative of other Claims or have been amended or superseded by later filed Claims or (b) were filed by holders of Delphi common stock solely on account of their stock holdings and were untimely filed pursuant to the Bar Date Order. The Debtors sent to each claimant whose proof of claim is subject to an objection pursuant to the Tenth Omnibus Claims Objection a personalized Notice Of Objection To Claim, which specifically identified such claimant's proof of claim that is subject to an objection and the basis for such objection. Responses to the Tenth Omnibus Claims Objection were due by 4:00 p.m. (prevailing Eastern time) on April 13, 2007.

2. As of April 19, 2007 at 12:00 p.m. (prevailing Eastern time), the Debtors had received 8 timely-filed formal responses to the Tenth Omnibus Claims Objection (collectively, the "Responses"). A chart summarizing each of the Responses by respondent is attached hereto as Exhibit A. The 8 Responses were filed by holders of 14 Claims.

¹ Capitalized terms used and not otherwise defined herein have the meanings ascribed to them in the Tenth Omnibus Claims Objection.

3. The Debtors believe that the Response (the "Contrarian Response") of Contrarian Funds, LLC ("Contrarian") has been resolved with respect to proof of claim numbers 2659, 3373, and 14321 (the "Resolved Claims"). In the Contrarian Response, Contrarian asserted that it does not oppose the disallowance of the Resolved Claims provided that the Debtors recognize Contrarian as the legal and beneficial holder of the surviving Claims. Because the Debtors have agreed to recognize Contrarian as the legal and beneficial holder of the surviving Claims, the Debtors believe that the Contrarian Response has been resolved.

4. As set forth on Exhibit A hereto, the Debtors have agreed to adjourn to a future date the claims hearing with respect to the 11 Claims for which Responses, other than the Contrarian Response, were filed. The revised proposed order, a copy of which is attached hereto as Exhibit B (the "Revised Order"),² reflects the adjournment of the hearings with respect to the claims for which Responses were filed, other than the Contrarian Response.

5. Pursuant to the Order Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 2002(m), 3007, 7016, 7026, 9006, 9007, And 9014 Establishing (i) Dates For Hearings Regarding Objections To Claims And (ii) Certain Notices And Procedures Governing Objections to Claims (Docket No. 6089) (the "Claims Objection Procedures Order"), the hearing with respect to each of the Claims for which a Response was filed, other than the Contrarian Response, will be adjourned to a sufficiency hearing or claims objection hearing, as appropriate, to determine the disposition of each such Claim.

² Attached hereto as Exhibit C is a copy of the Revised Order marked to show revisions to the form of proposed order that was submitted with the Tenth Omnibus Claims Objection.

6. Except for those Claims for which a hearing has been adjourned to a future hearing date, the Debtors believe that the Revised Order adequately addresses the concerns of the respondents. Thus, the Debtors request that the Court grant the relief requested by the Debtors and enter the Revised Order.

WHEREFORE the Debtors respectfully request that this Court enter an order (a) sustaining the Tenth Omnibus Claims Objection, subject to the modifications reflected in the Revised Order, (b) adjourning the hearing with respect to all Claims as to which a Response was filed, other than the Contrarian Response, pursuant to the Claims Objection Procedures Order, and (c) granting the Debtors such other and further relief as is just.

Dated: New York, New York
April 19, 2007

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